

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE

UNITED STATES OF AMERICA	)	
	)	NO. 3:19-CR-145
v.	)	
	)	JUDGE VARLAN
RICHARD GRAHAM	)	
DUSTY WILLIAM OLIVER	)	

**UNITED STATES' ADDENDUM TO THE SENTENCING  
MEMORANDUM AND MOTION FOR UPWARD VARIANCE**

The United States of America, by the United States Attorney for the Eastern District of Tennessee, submits the following additional information for the Court's consideration in sentencing the defendants.

Both defendants were given the opportunity to testify against their co-defendant for potential §5K1.1 consideration. Both were told the other had been given the same opportunity. Both took the offer and signed their plea agreements at approximately the same time. Both had plea agreements signed and filed with the Court in a little over two months after the indictment was filed against them. As no testimony was needed a §5K1.1 motion was not filed. In fairness to the defendants, the government is informing the Court for whatever weight, if any, the Court may give this information in sentencing the defendants.

Respectfully submitted,

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